



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278*

January 27, 2025

BY ECF

Hon. Gregory H. Woods
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. S. Kenneth Leech II, 24 Cr. 658 (GHW)

Dear Judge Woods:

The Government respectfully writes to update the Court on the status of the Government's discovery productions. On December 20, 2024, this Court so-ordered an agreed upon protective order governing discovery. (ECF No. 17.) On December 23, 2024, the Government made its first production from its document database ("Relativity Production-1"). Relativity Production-1 consisted of approximately 193,000 documents, produced in a load-file format. The Government also made a production of materials that were not stored on the document review database, which included full copies of search warrant returns. On January 27, 2025, the Government produced another set of materials that were not stored on the Government's document review database, which included approximately 4.7 terabytes of market data. The Government's document database vendor is preparing the next production ("Relativity Production-2"), which consists of approximately 258,000 documents. The vendor estimates it will complete preparing Relativity Production-2 on January 31, 2025. Accounting for time to copy and transmit the files, the Government expects to produce Relativity Production-2 to the defendant by February 7, 2025.

Because the Government's investigation is ongoing, the Government continues to receive additional discoverable materials and will promptly make rolling discovery productions going forward. The Government has conferred with defense counsel about its discovery productions and will continue to do so before the next conference, which is scheduled for May 19, 2025. Thank you very much.

Respectfully submitted,

DANIELLE R. SASSOON
United States Attorney

by: /s/
Thomas Burnett/Peter Davis
Assistant United States Attorneys
(212) 637-2468/1064

cc: Counsel (by ECF)